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Norman H. Bangerter  
GovernorSuzanne Dandoy, M.D., M.P.H.  
Executive DirectorDecember 10, 1986  
538-6170

2nd Draft

Kelcey Yarbrough Land  
U.S. EPA, Region VIII  
One Denver Place, Suite 1300  
999 18th Street  
Denver, CO 80202-2413RE: Denver & Rio Grande Western  
Railroad South Roper Yard  
Site Inspection

Dear Kelcey:

Enclosed is a revised Site Inspection report for the above-referenced site. The following describes our response to your draft comments dated November 14 regarding the State's Denver & Rio Grande Western Railroad South Roper Yard site inspection report. We have addressed your comments in the same order as they appear in your letter of December 8, 1986.

- I. Grammatical/typographical errors on pages 1, 4, 14, 18, 20, 23, and 24 have been corrected. Figure 3 has a north arrow on the map to enable readers to orient themselves with the site.
- II. Sample collection.  
The following information is provided to you for additional documentation as to why staff proceeded in the manner described in the SI report.
  1. Field filtering is not required by the Bureau's approved QAPP. The CERCLA program evaluates the appropriateness of field filtering on a site-specific basis. In instances where a site is located within 20 miles of the lab and arrangements have been made for the lab to filter samples, field filtering appears unwarranted.
  2. In the laboratory, all analysis for dissolved metals were first filtered using a 0.45 micron membrane filter and then acidified with nitric acid. The 500 ml portion of sample for dissolved metals came from the 1/2 gallon "chemistry" sample that had no preservatives in it. The sample was filtered at the laboratory within 4-6 hours of collection.
  5. The Bureau's approved PA/SI QAPP does not require sampling after stabilization. Joel Hebdon's December 4 response to EPA comments on Lark Tailings, which EPA transmitted with its comments on this site, explains why groundwater samples may be taken prior to stabilization of field parameters.

Kenneth L. Alkema, Director • Division of Environmental Health

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6. There is no contradiction on page 18. The 500 ml portion, as explained above, for dissolved metals came from the total chemistry sample bottle, 1/2 gallon. This portion was filtered at the laboratory and then acidified before analysis. The total time from sample collection to filtration and acidification was between 4-6 hours, thus no need for field filtration.

### III. Site Inspection

1. Identification  
EPA has not yet assigned a CERCLIS number for this site. The State does not assign separate numbers.
2. Part 3 -- Hazardous Conditions and Incidents  
This comment is unclear. The discussion of springs and copper sulfate leads one to believe that this comment is directed towards another site inspection.
3. Part 5 -- Description of Wells  
All of EPA's comments have been incorporated in the site inspection report at the appropriate place, and all wells appear to be in the same geohydrologic unit.
4. Land Use in Vicinity  
B) Residential areas--National/State Parks, Forests, or Wildlife Reserves has been corrected.
5. III -- Recommendations  
A follow-up site inspection was never recommended. This comment must be for another site inspection (see previous comment #2 above).
6. Part 3 -- Groundwater Contamination  
All of EPA's comments have been incorporated into this section.
7. Part 5 -- Drinking Water Supply  
The Bolinder Well is a community owned well serving a public supply and therefore is marked "B" not "D", non-community well. Three-hundred (300) gallons per minute is the yield of the U.S.G.S. well 24CDC-1, not the yield of the aquifer it is located in. Three hundred (300) gallons per minute is not equal to 14,400 gallons per day.  
  
The remaining comments have been incorporated in the report.
8. Part 9  
Information about the Vitro Uranium Company has been filled in; also site inspection dates have been entered at Sources of Information.

If you have any further specific questions, please call me at (801)  
538-6170.

Sincerely,

  
James Salmon  
Environmental Health Scientist

JS/pw

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